

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

TIG INSURANCE COMPANY,

Plaintiff,

v.

PUBLIC UTILITY DISTRICT NO. 1 of
COWLITZ COUNTY, WASHINGTON, a
Washington municipal corporation,

Defendant.

No. 04-5052RBL

MOTION FOR WITHDRAWAL

**NOTE ON MOTION CALENDAR:
NOVEMBER 28, 2008**

Plaintiff TIG INSURANCE COMPANY ("TIG") respectfully requests the Court to grant Bullivant Houser Bailey's Motion to Withdraw attorneys Douglas G. Houser, Lloyd Bernstein, Ronald J. Clark, Maria Sotirhos, and Tony Y. Anders as counsel of record for TIG. In accordance with CR7(d)(2), it is hereby certified that this Motion was served upon corporate representatives of TIG and counsel of record for Defendant Public Utility District No. 1 of Cowlitz County, Washington ("PUD").

It is also certified that corporate representatives for TIG have been advised that TIG is required by law to be represented by an attorney admitted to practice before this court and that failure to obtain a replacement attorney by the date the withdrawal is in effect may result in the dismissal of TIG's claims for failure to prosecute and/or entry of default against TIG against it as to any claims by PUD.

1 New counsel to be appointed by Plaintiff TIG in the above-captioned matter shall be
2 William J. Leedom, WSBA #2321; Michael Madden, WSBA #8747; Timothy E. Allen, WSBA
3 #35337; and Amy M. Magnano, WSBA #38484, of Bennett Bigelow & Leedom PS. All future
4 papers, pleadings/e-filings, and correspondence should be directed to:

5 William J. Leedom
6 Michael Madden
7 Timothy E. Allen
8 Amy M. Magnano
9 Bennett Bigelow & Leedom PS
10 1700 Seventh Ave., Ste. 1900
11 Seattle WA 98101
12 Phone: (206) 622-5511
13 Fax: (206) 622-8986
14 wleedom@bblaw.com

15 For all of the reasons stated above, the court should grant the Motion for Withdrawal
16 and allow substitution of new counsel on behalf of Plaintiff TIG.

17 DATED this 18th day of November 2008.

18 BULLIVANT HOUSER BAILEY PC

19 By /s/ Douglas G. Houser
20 BULLIVANT HOUSER BAILEY PC
21 Douglas G. Houser, OSB #60038
22 E-mail doug.houser@bullivant.com
23 Ronald J. Clark, OSB #88032
24 Lloyd Bernstein, OSB #00203
25 Maria E. Sotirhos, WSBA #21726
26 Tony Y. Anders, WSBA #31238
300 Pioneer Tower
888 SW Fifth Avenue
Portland, OR 97204-2089
Tel. (503) 228-6351
Fax (503) 295-0915

Attorneys for Plaintiff TIG Insurance Company

10915057.1

Certificate of Service

The undersigned certifies that on this 18th day of November 2008, I caused to be served the Notice of Withdrawal and Substitution of Counsel to:

Michael Ricketts	<input type="checkbox"/>	via hand delivery.
Kingman Peabody Fitzharris & Ringer, P.S.	<input type="checkbox"/>	via first class mail.
505 Madison St., Ste. 300	<input type="checkbox"/>	via facsimile.
Seattle, WA 98104	<input checked="" type="checkbox"/>	via ECF.
Arjang Victory	<input type="checkbox"/>	via hand delivery.
Jennifer Hoffman	<input type="checkbox"/>	via first class mail.
Matthew Gonzalez	<input type="checkbox"/>	via facsimile.
Bruckmann & Victory LLP	<input checked="" type="checkbox"/>	via ECF.
420 Lexington Ave., Ste. 1621		
New York, NY 10170		

I declare under penalty of perjury this 18th day of November 2008, at Portland, Oregon.

/s/ Douglas G. Houser
Douglas G. Houser